



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200

Dallas, TX 75202-2733

July 16, 2014

Ms. Joan M. Exnicios
Chief, Environmental Planning Branch
U.S. Department of Army
New Orleans District, Corps of Engineers
P.O. Box 60267
New Orleans, Louisiana 70160-0267

RE: Final Environmental Impact Statement (FEIS) for Calcasieu Lock Louisiana Feasibility
Study with Integrated Environmental Impact Statement

Dear Ms. Exnicios:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 Office in Dallas, Texas, has completed its review of the FEIS prepared by the U.S. Department of Army Corps of Engineers (USACE).

EPA provided comments on the Draft Environmental Impact Statement (DEIS) on December 3, 2013, in which the DEIS was rated as "EC-2", i.e., EPA has "environmental concerns and requests additional information". While many of our comments have been addressed in the FEIS, EPA continues to have environmental concerns with environmental justice and surrounding communities. We offer the following enclosed comments for your consideration and ask they be addressed in the Record of Decision (ROD).

Thank you for the opportunity to comment on the FEIS. Please send a copy of the ROD to my attention. If you have any questions or concerns, please contact Kimeka Price at (214) 665-7438 or via email at price.kimeka@epa.gov for assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Monica J. Smith", is written over a faint, larger signature.

Monica J. Smith
Acting Associate Director
Compliance Assurance and
Enforcement Division

Enclosure

**DETAILED COMMENTS
ON THE
FINAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE
U.S. DEPARTMENT OF ARMY CORPS OF ENGINEERS
CALCASIEU LOCK FEASIBILITY STUDY
WITH INTEGRATED ENVIRONMENTAL IMPACT STATEMENT
IN CALCASIEU PARISH, LOUISIANA**

Environmental Justice and Surrounding Communities

Changes have been made to the Socioeconomics and Environmental Justice sections in the Final Environmental Impact Statement (FEIS). However, the Environmental Justice section remains inadequately assessed. Specifically, the FEIS states that the minority percentage of 11.49% identified in the Census Tract is “similar” to the minority percentage of 3.12% for Cameron Parish. EPA disagrees with this conclusion because the Census Tract percentage is 3.68 times the Cameron Parish comparison value and thus meets the Council on Environmental Quality guideline of 50% or meaningfully greater. Further, stating a conclusion that there are no disproportionate impacts without supporting information and analysis is inadequate. USACE should establish the low income and minority community presence in the project area and assess any potential impacts of the project on these residents. For example, will construction of the project pose increased flood risk to this particular census tract? Will areas used for subsistence purposes be unavailable either temporarily or permanently?

Recommendation:

USACE should incorporate an assessment of potential impacts of the proposed project on Environmental Justice communities to determine whether the impacts are disproportionate, discuss environmental consequences of each alternative on the Environmental Justice communities, and establish the Environmental Justice community presence in the project area.